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Proposed Maximum Residue Limit PMRL2011-44

Imazapyr

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Under the authority of the *Pest Control Products Act*, Health Canada's Pest Management Regulatory Agency (PMRA) has received applications to register technical grade imazapyr and the end-use product Ares for use in Canada on Clearfield canola, Clearfield canola quality *Brassica juncea* and Clearfield lentils.

The evaluation of these imazapyr applications indicated that the end-use product has merit and value and the human health and environmental risks associated with its proposed uses are acceptable. Details regarding these applications can be found in Proposed Registration Decision PRD2011-12, *Imazapyr* posted to the Health Canada website on 2 September 2011.

Before registering a pesticide for food use in Canada, the PMRA must determine the quantity of residues that are likely to remain in or on the food when the pesticide is used according to label directions and that such residues will not be a concern to human health. This quantity is then legally established as a maximum residue limit (MRL). An MRL applies to the identified raw agricultural food commodity as well as to any processed food product that contains it, except where separate MRLs are specified for the raw agricultural commodity and a processed product made from it.

Consultation on the proposed MRLs for imazapyr was conducted domestically via PRD2011-12. Information regarding the proposed MRLs can be found in Sections 3.5.4 and 7.1 and Appendix II addresses the international situation and trade implications. Supporting field trial residue data are provided in Appendix I, Table 5 of Proposed Registration Decision.

To comply with Canada's international trade obligations, consultation on the proposed MRLs is also being conducted internationally by notifying the World Trade Organization, as coordinated by the Standards Council of Canada.

The proposed MRLs for imazapyr in Canada in or on food are as follows.

Table 1 Proposed Maximum Residue Limits for Imazapyr

Common Name	Residue Definition	MRL (ppm)	Food Commodity
Imazapyr	2-[4,5-dihydro-4-methyl-4-(1-methylethyl)-5-oxo-1*H*-imidazol-2-yl]-3-pyridinecarboxylic acid	0.2	Dry lentils
		0.05	Rapeseed (Crop Subgroup 20A); eggs; fat, meat, and meat byproducts of cattle, goats, hogs, horses, poultry and sheep
		0.01	Milk

MRLs are proposed for each food commodity included in the rapeseed crop subgroup in accordance with the Residue Chemistry Crop Groups webpage in the Pesticides and Pest Management section of Health Canada's website.

A complete list of all pesticide MRLs established in Canada can be found on the Maximum

Residue Limits for Pesticides webpage in the Pesticides and Pest Management section of Health Canada's website.

International Situation and Trade Implications

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns and the locations of the field crop trials used to generate residue chemistry data. For livestock commodities, differences in MRLs may also be due to different livestock feed items and practices.

Table 2 compares the MRLs proposed for imazapyr in Canada with corresponding American tolerances and Codex Alimentarius MRLs[1]. Note that a separate tolerance is established in the United States for livestock kidney and no tolerances are established for hog and poultry commodities. American tolerances are listed in the Electronic Code of Federal Regulations, 40 CFR Part 180, by pesticide. Currently, there are no Codex MRLs listed for imazapyr in or on any commodity on the Codex Alimentarius Pesticide Residues in Food webpage.

Table 2 Comparison of Canadian MRLs, American Tolerances and Codex MRLs

Food Commodity	Canadian MRL (ppm)	American Tolerance (ppm)	Codex MRL (ppm)
Dry lentils	0.2	Not established	Not established
Rapeseed (Crop Subgroup 20A)	0.05	Not established	Not established
Kidney of cattle, goats, horses and sheep	0.05*	0.2	Not established
Fat, meat and meat byproducts (except kidney) of cattle, goats, horses and sheep	0.05	0.05	Not established
Fat, meat and meat byproducts of hogs and poultry	0.05	Not established	Not established
Eggs	0.05	Not established	Not established
Milk	0.01	0.01	Not established

*a separate American tolerance is established for the listed livestock kidney commodities which are covered by the Canadian MRL proposed for all meat byproducts.

[1] The Codex Alimentarius Commission is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.